

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GEORGE SANTOS,

Plaintiff,

- against -

JAMES C. KIMMEL a/k/a JIMMY KIMMEL,  
AMERICAN BROADCASTING COMPANIES,  
INC., and THE WALT DISNEY COMPANY,

Defendants.

Case No. 1:24-cv-01210-DLC

**DECLARATION OF NATHAN SIEGEL IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS COMPLAINT**

I, Nathan Siegel, declare as follows:

1. I am a partner at Davis Wright Tremaine LLP, attorneys for Defendants James C. Kimmel a/k/a Jimmy Kimmel, American Broadcasting Companies, Inc., and The Walt Disney Company (collectively, "Defendants"). I submit this declaration in support of Defendants' motion to dismiss the Complaint.

2. The grounds for Defendants' dismissal motion are set forth in the accompanying memorandum of law. I submit this declaration for the limited purpose of annexing copies of documents relevant to the motion. As discussed in the accompanying memorandum of law in support of the motion to dismiss, these documents are subject to judicial notice and/or incorporated by reference into the Complaint. By separate letter, Defendants seek leave to lodge with the Clerk of Court a DVD containing the videos attached as Exhibit 11 and Exhibit 12.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Cameo's Terms of Service, last updated November 22, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Cameo’s Community Guidelines, last updated February 2, 2023.

5. Attached hereto as **Exhibit 3** is a true and correct copy of an article featuring an interview by Marcia Kramer entitled “Former Rep. George Santos Says He Makes More Money from Cameo than He Did in Congress,” published by CBS News on December 10, 2023, which is also available at <https://www.cbsnews.com/newyork/news/george-santos-cameo-income-congress-the-point-with-marcia-kramer/>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of an article by Bess Levin entitled “George Santos Is Making a Ridiculous Amount of Money on Cameo,” published in *Vanity Fair* on December 6, 2023, which is also available at <https://www.vanityfair.com/news/2023/12/george-santos-cameo-earnings>.

7. Attached hereto as **Exhibit 5** is a true and correct copy of an article by Gloria Oladipo entitled “George Santos Reportedly Making Six Figures by Selling Cameo Videos: Disgraced Lawmaker Generating More Income Making Personalized Videos than Previous Salary as US Congressman,” published in *The Guardian* on December 6, 2023, which is also available at <https://www.theguardian.com/us-news/2023/dec/06/george-santos-cameo-income-salary>.

8. Attached hereto as **Exhibit 6** is a true and correct copy of an article entitled “George Santos Cashing in on Cameo...After Congress Expulsion,” published by TMZ on December 4, 2023, <https://www.tMZ.com/2023/12/04/george-santos-joins-cameo-after-expelled-congress/>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a post by George Santos replying to a post by John Fetterman on Twitter (a/k/a X), dated December 4, 2023 at 4:51 PM, which is also available at <https://twitter.com/MrSantosNY/status/1731793391992643992>.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a post by Cameo on TikTok, dated December 6, 2023, which is also available at <https://www.tiktok.com/@cameo/video/7309503020906056991>.

11. Attached hereto as **Exhibit 9** is a true and correct copy of an article by Olivia Craighead entitled “Everyone Wants a George Santos Cameo for Christmas, Apparently,” published by *New York* magazine’s *The Cut* on December 4, 2023, which is also available at <https://www.thecut.com/2023/12/george-santos-has-joined-cameo.html>.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a post by Shakira Cristal reposting a Cameo video by George Santos on TikTok, dated December 6, 2023, which is also available at <https://www.tiktok.com/@planejanesnewleaf/video/7309703932790459679>.

13. Attached hereto as **Exhibit 11** is the relevant portion of the December 7, 2023 broadcast of *Jimmy Kimmel Live!*, which is also available at <https://www.youtube.com/watch?v=iyoRHDkJKlo&t=413s>.

14. Attached hereto as **Exhibit 12** is the relevant portion of the December 11, 2023 broadcast of *Jimmy Kimmel Live!*, which is also available at <https://www.youtube.com/watch?v=5-4SUO4Rlik&t=410s>.

15. Attached hereto as **Exhibit 13** is a true and correct copy of an article by Ross Anderson entitled “George Santos Is Demanding \$20,000 from Jimmy Kimmel for Cameos,” published in *The Spectator* on December 11, 2023, which is also available at <https://thespectator.com/topic/george-santos-cameo-jimmy-kimmel-demanding-20000/>.

16. Attached hereto as **Exhibit 14** is a printout from the U.S. Copyright Office's Public Catalog for the copyright registration for "Santos 1," Registration No. PA 2-449-879.

17. Attached hereto as **Exhibit 15** is a printout from the U.S. Copyright Office's Public Catalog for the copyright registration for "Santos 2," Registration No. PA 2-449-882.

18. Attached hereto as **Exhibit 16** is a printout from the U.S. Copyright Office's Public Catalog for the copyright registration for "Santos 3," Registration No. PA 2-451-684.

19. Attached hereto as **Exhibit 17** is a printout from the U.S. Copyright Office's Public Catalog for the copyright registration for "Santos 4," Registration No. PA 2-451-685.

20. Attached hereto as **Exhibit 18** is a printout from the U.S. Copyright Office's Public Catalog for the copyright registration for "Santos 5," Registration No. PA 2-451-683.

21. Attached hereto as **Exhibit 19** is a true and correct copy of a press release entitled "Congressman George Santos Charged with Conspiracy, Wire Fraud, False Statements, Falsification of Records, Aggravated Identity Theft, and Credit Card Fraud," released by the U.S. Attorney's Office for the Eastern District of New York on October 10, 2023, which is also available at <https://www.justice.gov/usao-edny/pr/congressman-george-santos-charged-conspiracy-wire-fraud-false-statements-0>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 29, 2024.

/s/ Nathan Siegel  
Nathan Siegel